

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)	
)	Bankruptcy Case
UNIMEX CORPORATION,)	No. 20-12535-BFK
)	Chapter 11
Debtor.)	
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)	
JOLENE E. WEE, PLAN TRUSTEE OF)	
UNIMEX CORPORATION,)	
)	
Plaintiff,)	
)	
)	
v.)	Adversary Proceeding No. 22-01051-BFK
)	
YANGZHOU PUTIAN SHOEMAKING CO.,)	
LTD.,)	
)	
Defendant.)	

**NOTICE OF MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT AND
NOTICE OF HEARING**

PLEASE TAKE NOTICE that Jolene E. Wee, the Plan Trustee (“Trustee”) for Unimex Corporation, has filed a Motion to Continue Trial (“Motion”).

UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THE MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY WITHIN 21 DAYS OF THE SERVICE OF THIS NOTICE, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND TREAT THE MOTION AS CONCEDED.

A HEARING TO CONSIDER THE RELIEF REQUESTED IN THE MOTION IS SCHEDULED FOR DECEMBER 12, 2023 AT 9:30 A.M. IN COURTROOM I OF THE UNITED STATES BANKRUPTCY

**COURT, 200 SOUTH WASHINGTON STREET, ALEXANDRIA,
VIRGINIA 22314.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: November 15, 2023

Respectfully submitted,

JOLENE E. WEE, PLAN TRUSTEE

By Counsel

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By: /s/ Dylan G. Trache
Dylan G. Trache, Va. Bar No. 45939

Counsel to the Plan Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of November, 2023, a copy of the foregoing Notice was sent by Federal Express, Signature Required, to:

Yangzhou Putian Shoemaking Co., Ltd.
1 Zhennen Road
Linze Town
Gaoyou City, Jiangsu 225621
China

/s/ Dylan G. Trache
Dylan G. Trache